

**UNITED STATES DISTRICT COURT  
DISTRICT OF PUERTO RICO**

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In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

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In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO HIGHWAYS AND  
TRANSPORTATION AUTHORITY (“HTA”)

Debtor.

PROMESA

Title III

No. 17 BK 3567-LTS

**AUTOPISTAS METROPOLITANAS DE PUERTO RICO, LLC’S MOTION  
TO INFORM COURT OF ITS FILING OF MOTION FOR REASSIGNMENT  
OF AMBAC LITIGATION TO JUDGE LAURA TAYLOR SWAIN  
AND REQUEST FOR CONSENT**

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<sup>1</sup> The Debtors in these Title III cases, along with each Debtor’s respective Title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17-BK-3283 (LTS)) (Last Four Digits of Federal Tax ID: 3481), (ii) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566(LTS)) (Last Four Digits of Federal Tax ID: 9686), (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567 (LTS)) (Last Four Digits of Federal Tax ID: 3808), and (iv) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284 (LTS)) (Last Four Digits of Federal Tax ID: 8474); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17-4780 (LTS)) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5233-LTS) (Last Four Digits of Federal Tax ID: 3801).

To the Honorable United States District Court Judge Laura Taylor Swain:

Autopistas Metropolitanas de Puerto Rico, LLC (“Metropistas”) respectfully submits this informative motion (the “Informative Motion”) requesting consent for reassignment of the case styled *Ambac Assurance Corporation v. Autopistas Metropolitanas de Puerto Rico, LLC* (No. 3:20-cv-01094 (JAG)) (the “Ambac Litigation”)<sup>2</sup>. This case is currently assigned to the Honorable Pedro A. Delgado-Hernández. The Complaint has been attached to this motion as Exhibit A.

As set forth in more detail in its motion to reassign the case, which has been filed contemporaneously with Judge Delgado-Hernández, and is attached to this Informative Motion as Exhibit B (the “Reassignment Motion”), reassignment of the Ambac Litigation is warranted and necessary to (1) fulfill the purposes of the Puerto Rico Oversight, Management, and Economic Stability Act (“PROMESA”), 48 U.S.C. §§ 2101-2241; (2) serve the interests of judicial economy; and, (3) avoid the risk of inconsistent rulings on the property interests of HTA and/or the Commonwealth (to the extent applicable) in the Concession Agreement and/or the Lump Sum Payment (as defined in the Reassignment Motion).

**WHEREFORE**, Metropistas respectfully requests the Court to take note of the foregoing and to grant its consent to the reassignment of the Ambac Litigation.

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<sup>2</sup> A copy of the complaint is attached as Exhibit A.

**RESPECTFULLY SUBMITTED.**

Dated: March 2, 2020

**MCCONNELL VALDÉS LLC**  
270 Muñoz Rivera Avenue, Suite 7  
Hato Rey, Puerto Rico 00918  
PO Box 364225  
San Juan, Puerto Rico 00936-4225  
Telephone: 787-250-5632  
Facsimile: 787-759-9225

By: s/ Alejandro J. Cepeda-Díaz  
Alejandro J. Cepeda-Díaz  
USDC No. 222110  
Email: ajc@mcvpr.com

By: s/ Nayuan Zouairabani  
Nayuan Zouairabani  
USDC No. 226411  
Email: nzt@mcvpr.com

**GIBSON, DUNN & CRUTCHER LLP**  
James L. Hallowell (*pro hac vice* forthcoming)  
jhallowell@gibsondunn.com  
Matt J. Williams (*pro hac vice* forthcoming)  
mjwilliams@gibsondunn.com  
Keith R. Martorana (*pro hac vice* forthcoming)  
kmartorana@gibsondunn.com  
200 Park Avenue  
New York, NY 10166-0193  
Telephone: 212.351.4000

*Attorneys for Autopistas Metropolitanas de Puerto Rico*